



Miedel & Mysliwiec LLP

January 7, 2021

BY ECF

Hon. Raymond J. Dearie
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Bebars Baslan*, 13-Cr-220 (RJD)

Dear Judge Dearie:

My reply brief in this § 2255 case is currently due on January 13, 2021. With the consent of the government, I respectfully request a one-week extension of the due date. It has been exceedingly difficult to communicate with Mr. Baslan given the near constant lockdowns he has endured in his correctional facility, which have also prevented him from getting legal calls. Just last week I had a call scheduled with him which had to be postponed to January 11th because of a lockdown. There are certain issues I must discuss with him concerning the government's response, before I am prepared to file a reply. I hope, however, that a one-week extension should be sufficient.

Accordingly, I respectfully request the Court to extend my filing deadline to January 20, 2021.

Thank you for your consideration.

Respectfully submitted,

/s/

Florian Miedel
Attorney for Bebars Baslan

Cc: AUSA Andrew Wang (by ECF)